

UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF NEW YORK

JULIET D'SOUZA,

Plaintiff,

v.

ZEENA LOBO and NEIL LOBO,

Defendants.

Civ. No. 09-0410 (TCP) (ARL)

**JOINT DISCOVERY PLAN**

Plaintiff Juliet D'Souza ("Plaintiff"), through her attorneys, the Asian American Legal Defense and Education Fund (AALDEF) and the Legal Aid Society, and Defendants Zeena Lobo and Neil Lobo ("Defendants"), through their attorneys, William D. Wexler, pursuant to this Court's Scheduling Order and FRCP 26(f) hereby submit this Joint Discovery Plan:

**1. Identification of Parties' Counsel:**

**Counsel for Plaintiff, Juliet D'Souza:**

Ivy O. Suriyopas, Esq.  
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**Counsel for Defendants, Zeena Lobo and Neil Lobo:**

William D. Wexler, Esq.  
WILLIAM D. WEXLER

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North Babylon, NY 11703  
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2. **Plaintiff's Description of Case:**

This is a matter wherein Plaintiff is claiming violations of Federal human trafficking laws, Federal and New York employment laws in relation to the provision of domestic work for Defendants. Specifically, Plaintiff's seven-count Complaint addresses violations of the Federal Trafficking Victims Protection Reauthorization Act, Federal minimum wage, State minimum wage, State overtime law, State unpaid wages law, and State spread of hours law.

**Defendant's Narrative and Affirmative Defenses:**

Defendants deny, in toto, all of the allegations raised in Plaintiff's Complaint.

3. **Continuation of Case:**

4. **Status of Settlement Discussions:**

5. **Provision of Rule 26(a) information:**

6. **Difficulties in completing Rule 26(a) disclosures:**

7. **Discovery Status:**

8. **Rule 26(f) Compliance:**

9. **Discovery Plan:**

- a. **Discovery Scope:** Discovery will be needed by each party on the following subjects:

- i. all aspects of the Complaint filed by the Plaintiff;
- ii. Plaintiff's damages; and
- iii. all defenses set forth by Defendant.

- b. Discovery Phases: Discovery should not be conducted in phases or be limited to particular issues. The Parties shall serve their discovery demands no later than June 30, 2009.
- c. Interrogatories: A maximum of 25 combined interrogatories, including sub-parts, may be submitted by each party to any other party.
- d. Depositions: A maximum of 10 depositions may be taken by each party without leave of Court.
- e. Experts and Expert Reports: Disclosure of the identity of and reports from retained experts under FRCP 26(a)(2) shall be due:

From Plaintiff: December 11, 2010

- f. Experts and Expert Reports: Disclosure of the identity of and reports from retained experts under FRCP 26(a)(2) shall be due:

From Defendants: January 29, 2010

- g. Amend Pleadings/ Add Parties: The parties must move to amend pleadings on or before August 28, 2009.
- h. Dispositive Motions: The parties believe that all potentially dispositive motions should be filed within 60 days of the close of fact Discovery.
- i. Factual Discovery Completion Date: The parties expect that discovery should be completed by October 16, 2009.

j. Expert Discovery Completion Date: The parties expect that discovery should be completed by March 13, 2010.

k. Special Discovery Mechanism: Neither party foresees such as necessary at this time.

l. Pretrial Conference Date: \_\_\_\_\_.

m. Trial Date: \_\_\_\_\_.

10. **Discovery Problems**:

11. **Special Discovery Needs**:

12. **Alternate Dispute Resolution**:

13. **Bifurcation**:

14. **Settlement Conference**:

Dated: New York, New York  
June 12, 2009

Very respectfully submitted,

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/s/

ASIAN AMERICAN LEGAL DEFENSE  
AND EDUCATION FUND

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\_\_\_\_\_  
/s/

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\_\_\_\_\_  
/s/

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